

Deficiencies and Corrective Actions

Tulare County Environmental Health Evaluation Date: October 18, 2005

1. **Deficiency:** The Summary of Findings noted that: "The CUPA had not inspected all businesses subject to the HMRRP, HW, and CalARP programs every three years."

CUPA Corrective Action: The **Preliminary Corrective Action** and **Timeframe** sections of the Summary of Findings states "The CUPA will increase inspections to meet the frequencies stated in their Inspection and Enforcement Plan within 1 year".

The CUPA is currently on pace to meet required inspection frequencies in the above programs within one year. Inspection totals by program for the two calendar quarters since the CUPA evaluation of October 18, 2005, are presented below:

	NUMBER OF FACILITIES	REQUIRED ANNUAL INSPECTIONS	REQUIRED INSPECTIONS WITHIN 6 MONTHS	INSPECTIONS PERFORMED DURING PREVIOUS 6 MONTHS
HAZARDOUS MATERIAL RELEASE RESPONSE PLANS	917	306	153	166
HAZARDOUS WASTE GENERATORS	492	164	82	60
UNDERGROUND STORAGE TANKS	260	260	130	147
RISK MANAGEMENT PLANS	48	32	16	16

2. **Deficiency:** The Summary of Findings noted that: "The CUPA is not consistently ensuring that businesses found to have minor violations return to compliance within 30 days from the date of the notice to comply. Based on a review of the CUPA's files, some businesses found to have minor violations did not submit documentation demonstrating the violations have been corrected. In addition, the CUPA is not consistently ensuring that businesses found to have minor violations sign a notice to comply certifying that the violation(s) have been corrected, and return it to the CUPA."

CUPA Corrective Action: The **Preliminary Corrective Action** and **Timeframe** sections of the Summary of Findings states "The CUPA will begin requiring

businesses to certify correction of all minor violations and submit documentation demonstrating correction immediately”.

The CUPA immediately began requiring all businesses to return Certification of Return to Compliance forms or otherwise document correction of violations. In addition, violation codes have been entered into the Envision® computerized database, and the CUPA is currently using the Inspection Violation Review module to track return to compliance. Use of Inspection Violation Review will allow the CUPA to readily document and report return to compliance data.

Morris, Robbie

From: Morris, Robbie
Sent: Tuesday, May 23, 2006 4:27 PM
To: 'jmartens@tularehhsa.org'
Cc: Sylve, Loretta; 'Brian Abeel'
Subject: re: Tulare Deficiencies and Corrective Actions

Joel.

Again, thank you for your quick response. Based on Cal/EPA's review of the submitted data, the corrective action for deficiency no. 2 is acceptable. As for deficiency no. 1, it sounds like you all are on the right track to meeting your required frequencies. Keep up the good work. However Cal/EPA will continue tracking this deficiency until the inspection frequencies have been met. Please continue to provide an update, using the same format, in the next quarterly report (August 31, 2006). If you have any questions or concerns, feel free to contact me.

Thanks.

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